

**UNITED STATES DISTRICT COURT**

**DISTRICT OF MASSACHUSETTS**

KIRK DAHL, et al, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

Lead Case No. 1:07-cv-12388-EFH

(Consolidated)

BAIN CAPITAL PARTNERS, LLC, THE  
BLACKSTONE GROUP L.P., THE  
CARLYLE GROUP, THE GOLDMAN  
SACHS GROUP, INC., GS CAPITAL  
PARTNERS, JP MORGAN CHASE & CO.,  
JP MORGAN PARTNERS, LLC,  
KOHLBERG KRAVIS ROBERTS &  
COMPANY, L.P., MERRILL LYNCH &  
CO., INC., MERRILL LYNCH GLOBAL  
PARTNERS, INC., PERMIRA ADVISORS  
LLC, PROVIDENCE EQUITY PARTNERS,  
INC., SILVER LAKE PARTNERS, TGP  
CAPITAL, L.P., THOMAS H. LEE  
PARTNERS, L.P. AND WARBURG  
PINCUS LLC,

Defendants.

CLASS ACTION

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**PLAINTIFFS' MOTION TO COMPEL WITH RESPECT TO PROVIDENCE EQUITY  
PARTNERS, INC.'S RESPONSES TO INTERROGATORIES 1, 2 AND 4**

Plaintiffs Police and Fire Retirement System of The City of Detroit, Kirk Dahl, Helmut Goeppinger, Joseph s. Fisher, M.D., P.C. New Profit Sharing Trust by Joseph S. Fisher, M.D., Trustee, James J. Klein, M.D., Rufus Orr, and Robert Zimmerman (“Plaintiffs”) respectfully request that this Court grant this motion to compel sought by Plaintiffs pursuant to Local Rule 37.1 and the Federal Rules of Civil Procedure, Rule 33.

As set forth more fully in the accompanying memorandum of points and authorities, Plaintiffs will and do hereby move for an order directing Defendant Providence Equity Partners, Inc. to:

1. Either declare that the documents provided in response to Plaintiffs’ Interrogatories 1, 2 and 4 contain complete answers to those Interrogatories; or
2. Supplement the answers to Plaintiffs’ Interrogatories 1, 2 and 4 to reflect responsive information not contained in said documents, such as information related to oral communications; and
3. State which documents are responsive to Plaintiffs’ Interrogatory 1, 2 and 4 respectively.

This motion is based on the accompanying memorandum of points and authorities, the declaration of Michael G. Stewart with attached exhibits, the complete files and records in this action, and other evidence as may be presented at or before the hearing on this motion.

A proposed order is submitted herewith.

WHEREFORE, Plaintiffs respectfully request that this Court grant this motion to compel and further relief as the Court deems just and appropriate.

## REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), Plaintiffs respectfully request oral argument on this Motion.

Dated: August 25, 2009

/s/ Michael G. Stewart

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**CERTIFICATE OF COMPLIANCE WITH  
LOCAL RULES 7.1 AND 37.1**

The undersigned hereby certifies that Plaintiffs' counsel have conferred with counsel for Defendants and have attempted in good faith to resolve or narrow the issues raised by this Motion.

/s/ Michael G. Stewart  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 25, 2009, a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses of all participating CM/ECF attorneys. I hereby certify that I forwarded paper copies of the foregoing document by U.S. Postal Service to all attorneys who have entered an appearance yet are not registered with the Electronic Filing system.

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